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9 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 NATHANIEL JAMES MCGUIRE

16 Defendant.  
17  
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No. 2:24-MJ-05907

GOVERNMENT EX PARTE APPLICATION TO  
CONTINUE POST-INDICTMENT  
ARRAIGNMENT DATE FOR DEFENDANT  
NATHANIEL JAMES MCGUIRE

**CURRENT PIA DATE:** 10/18/2024  
**PROPOSED PIA DATE:** 10/25/2024

19 The government applies ex parte for an order continuing the  
20 Post-Indictment Arraignment in the above-entitled case currently set  
21 for October 18, 2024 to October 25, 2024.

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1 This ex parte application is based on the attached the  
2 declaration of MARK TAKLA and the records and files in this case.

3 Dated: October 17, 2024

Respectfully submitted,

4 E. MARTIN ESTRADA  
United States Attorney

5 DAVID T. RYAN  
6 Assistant United States Attorney  
7 Chief, National Security Division

8 /s/  
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9 MARK TAKLA  
KATHRYNNE SEIDEN  
10 Assistant United States Attorneys

11 Attorneys for Applicant  
UNITED STATES OF AMERICA  
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DECLARATION OF MARK TAKLA

I, MARK TAKLA, declare as follows:

1. I am an Assistant United States Attorney for United States Attorney's Office for the Central District of California and am assigned to this matter. Defendant is currently charged with a violation of 18 U.S.C. § 844(i) (Malicious Damage to a Building by Means of Explosive).

2. Defendant made his initial appearance on September 27, 2024. At the hearing, defendant waived his right to a preliminary hearing (ECF No. 10) and the Court set Post-Indictment Arraignment for October 18, 2024 (ECF No. 11).

3. As of the filing of this application, the government has not obtained an indictment.

4. An indictment must be returned within 30 days of defendant's arrest, which is October 27, 2024. 18 U.S.C. § 3161(b).

5. On October 16, 2024, I contacted defense counsel, Deputy Public Defenders Erica Choi and Iboh Umodu, regarding defendant's position on the government's application. They stated that defendant takes no position on the government's request to continue the post-indictment arraignment.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief and that this declaration is executed at Orange County, California, on October 17, 2024.



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MARK TAKLA